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Attorneys for Plaintiffs

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF OREGON

PORTLAND DIVISION

OREGON NATURAL DESERT ASS’N,
et al.

No. 3:19-cv-01550-SB

Plaintiffs,

NOTICE OF RELATED CASE

v.

BARRY BUSHUE, State Director,
BLM Oregon/Washington, *et al.*,

Defendants,

and

CAHILL RANCHES, INC., an Oregon
corporation,

Defendant-Intervenor.

NOTICE OF RELATED CASE

Pursuant to [Local Rule 42](#), plaintiffs, the Oregon Natural Desert Association, Audubon Society of Portland, and Defenders of Wildlife (collectively, “ONDA”), provide notice to the Court of a recently-filed related case, *Cahill Ranches, Inc. v. Bureau of Land Management*, No. 1:21-cv-1363-CL (D. Or. filed Sept. 16, 2021). The new case shares a “common question of law or fact” with the above-captioned, existing case, *Oregon Natural Desert Association v. Bushue*, No. 3:19-cv-01550-SB (D. Or. filed Sept. 27, 2019) (and in which Cahill is an intervenor). *See Fed. R. Civ. P. 42(a)* (providing for consolidation of “actions involving a common question of law or fact”); *see also Local Rule 42-2* (“It is the responsibility of counsel to identify complex or related cases and to bring the matter promptly to the attention of the Court.”); *but see Cahill Ranches*, No. 21-1363, [ECF Nos. 1](#) (Complaint), [1-1](#) (Civil Cover Sheet) (not identifying related case).

As ONDA already has indicated to Judge Clarke in ONDA’s partially-unopposed motion to intervene in the newly-filed case, consolidation with this first-filed case is appropriate because both cases involve the same subject matter—the Bureau of Land Management’s 2015 conservation plan for greater sage-grouse in Oregon—and the same real property: the Rahilly-Gravelly Research Natural Area. This is one of 13 Research Natural Areas on Bureau-managed federal public land that the 2015 conservation plan closed to livestock grazing. ONDA is in the process of conferring with the Federal defendants and Cahill Ranches on transfer and consolidation of the newly-filed case with this one.

Respectfully submitted this 1st day of November, 2021.

s/ Peter M. Lacy

Peter M. Lacy
Oregon Natural Desert Association

Of Attorneys for Plaintiffs